## Wiregrass Telecom, Inc.

#### EB 06-36 EB-06-TC-060

## CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

February 6, 2006

#### VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12<sup>th</sup> Street S.W.
Washington, D.C. 20554

#### Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Wiregrass Telecom, Inc.

James E. Etheredge

Chief Operating Officer

cc: Bryon McCoy via e-mail byron.mccoy@fcc.gov
Best Copy and Printing, Inc., via e-mail fcc@bcpiweb.com

# Before the Federal Communications Commission Washington, D.C. 20554

### Certification of CPNI FILING FEBRUARY 6, 2006 OF WIREGRASS TELECOM, INC.

#### EB-06-TC-060 EB Docket No. 06-36

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Wiregrass Telecom, Inc., d/b/a Graceba Telephone Company ("Wiregrass") states as follows:

- 1. I am an officer of Wiregrass and this certificate is based on my personal knowledge.
- 2. Wiregrass is a small competitive local exchange carrier ("CLEC"). Wiregrass also provides long distance and broadband access services. Wiregrass provides services to approximately seven thousand (7,000) customers. Wiregrass implemented the following measures to comply with the FCC rules contained in the subpart addressing CPNI for 2005:
  - (a) Wiregrass elected to use CPNI only to market to its customers the same category of services and products that the customer currently received from Wiregrass, which is a use that does not require customer approval in accordance with 47 C.F.R. § 64.2005;
  - (b) Wiregrass did not turn over CPNI to any third parties in 2005;
  - (c) If Wiregrass uses CPNI in the future for sales and marketing campaigns it will maintain all required records, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns.

- (d) As referenced in (b) above CNPI was not disclosed to third parties in 2005, however, in the event that Wiregrass later seeks to utilize, disclose or permit CPNI access and that includes disclosure to third parties, Wiregrass will maintain a record of all instances where CPNI is disclosed or provided to third parties in the future, or where third parties are allowed access to CPNI. Such record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. This record shall be retained for a minimum of one year.
- (e) Wiregrass sales personnel are required to obtain supervisory approval of any proposed outbound marketing campaign.
- 3. Wiregrass has not undertaken to solicit customer approval through opt-out or opt-in mechanisms because it has only used CPNI in those instances that are permitted without customer approval in accordance with 47 C.F.R. § 64.2005. However, in the event that Wiregrass later seeks to utilize, disclose or permit CPNI access such that customer approval is required, Wiregrass will, if it utilizes an opt-out method, provide written notice within five business days to the Commission of any future instance where the opt-out mechanisms do not work properly, except when such incident is isolated and an anomaly.
- 4. Wiregrass plans to adopt additional procedures to ensure familiarity and compliance with the Commission's CPNI rules in the event that it should later decide to utilize, disclose or permit access to CPNI for any purpose that requires customer approval.

Wiregrass Telecom, Inc.

James E. Etheredge

Jts: Chief Operating Officer